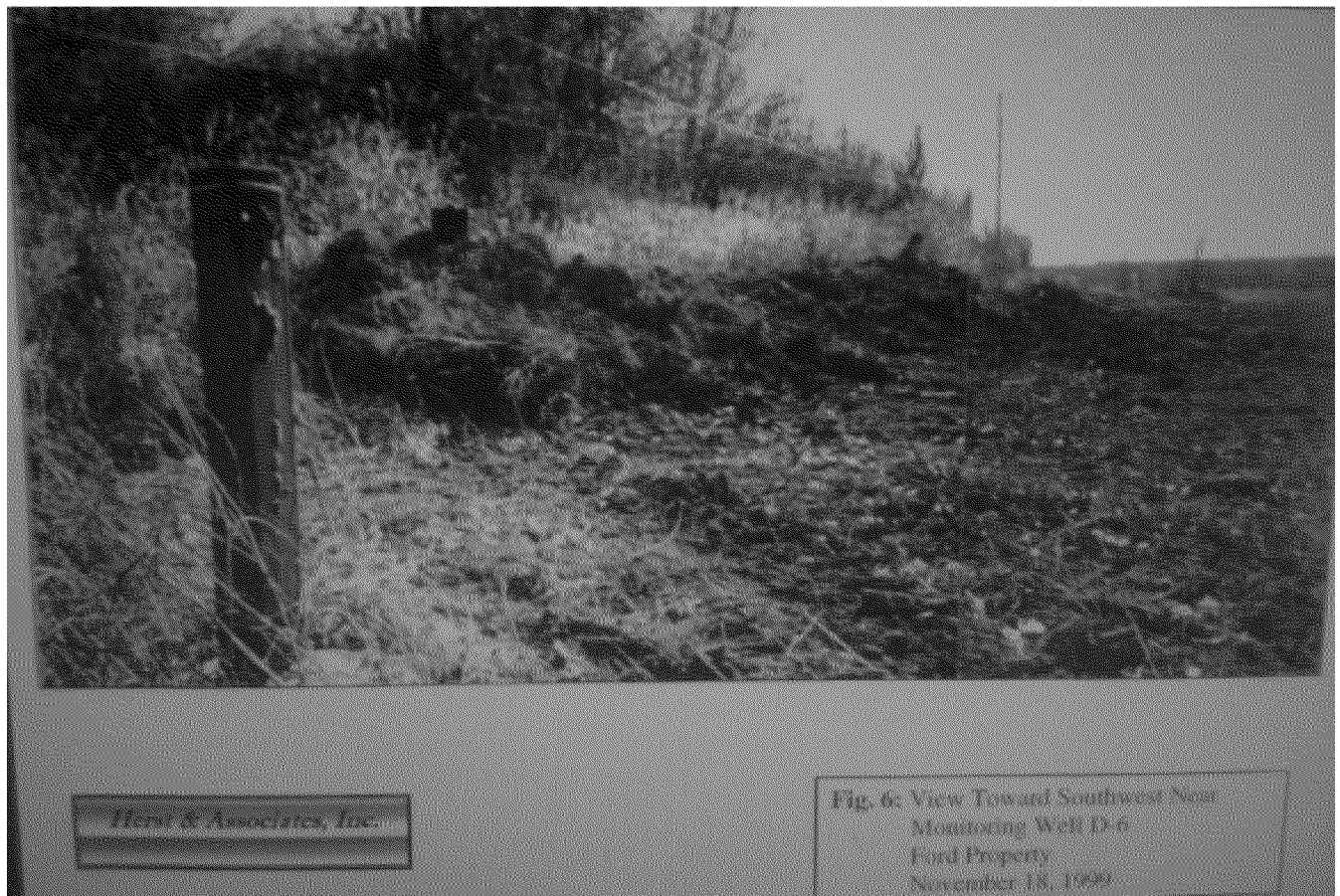


### Ford Property – Still Not Cleaned After 14+ Years

In the following document, “Interim Measures Work Plan for Investigative Derived Waste and Surface Soil Located on Properties Owned by Ford Motor Credit Company and Crossroad Properties, LLC” dated December 29, 1999, the PRP’s themselves proposed cleaning up the Ford property, yet, to this day, it remains uncleaned, even with the following warning from the PRPs to the EPA found on PDF page 6, Document page 3:

“Based on the potential for wind or precipitation runoff-induced erosion and transport of these soils, the Respondents through this work plan are proposing to conduct, subject to EPA approval, **a time-critical removal action to retrieve and relocate the soil piles to prevent potential offsite transport.**”

Based on a conversation at the CAG Technical Committee meeting held Tuesday, September 17<sup>th</sup>, 2013, Paul Rosasco, P.E., and Owner and Engineer at EMSI (the firm that has been fulfilling the EPA studies on behalf of the PRPs since 1994), this material originally was carried by erosion of Area 2 onto the Ford Property in 1974 and has since been moved TWICE by landowners and/or land lessees DISPUTE the presence of RADIOACTIVE SIGNAGE! (see next page for more recent images)



**November 2002** – Note grassy area in Ford Property behind curved line of parked trucks. This is where the 1999 EMSI report found radioactive material outside the fence line.



**November 2003** – Trucks parked previous grassy area after pushing soil against fence line.



**ENGINEERING MANAGEMENT SUPPORT INC.**

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December 29, 1999

U.S. Environmental Protection Agency  
Region VII  
901 North 5<sup>th</sup> Street  
Kansas City, Kansas 66101

**ATTENTION :** Mr. Dan Wall

**SUBJECT : Interim Measures Work Plan  
Soil Piles on the Ford and Crossroad Properties  
West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Mr. Wall,

On behalf of Cotter Corporation (N.S.L.), Laidlaw Waste Systems (Bridgeton), Inc., Rock Road Industries, Inc., and the United States Department of Energy (the "Respondents"), Engineering Management Support Inc. (EMSI) submits the attached Interim Measures Work Plan to address occurrences of radionuclides in surficial soil on properties owned by Ford Motor Credit Company (Ford) and Crossroad Properties, LLC. (Crossroad) located immediately west of Radiological Area 2 of the West Lake Landfill. If you have any questions or desire additional information related to this Work Plan or any other aspect of the project, please do not hesitate to contact me.

Sincerely,  
ENGINEERING MANAGEMENT SUPPORT, Inc.

  
Paul V. Rosasco, P.E.

From PDF page 6, Document page 3 of the above document:

"On November 18, 1999, Herst & Associates, Inc. (Herst, 1999) performed a site walkover of the Ford and Crossroad properties and observed that the upper 2 to 6-inches of soil material had been scraped from the Ford Buffer and Lot 2A2 and pushed up against the boundary fence separating the Ford and Crossroad properties from the West Lake Landfill (Figure 3). A minor amount of scraped material was also mounded along the northern portion of the Ford and Crossroad properties. Approximately 10 to 12 inches of gravel had been placed over the eastern portion of the Property (Lot 2A1 and a small component of Lot 2A2), while the remaining disturbed soils were left exposed. The dates during which the excavation occurred are not known.

The excavation was performed despite signage warning of the presence of radioactive contamination. Numerous sets of tire tracks were also observed on the excavated property, including tracks indicating that vehicles have been driven directly past a radioactive contamination warning sign. It was noted by Herst & Associates, Inc. (Herst, 1999) that the excavation process has "increased the potential for windblown particles to exit the property", and the mounded material is "subject to erosion potential due to runoff from

precipitation".

EPA was notified on November 24, 1999, via telephone conversation Hockley on behalf of the Respondents and David Hoefer of EPA that an unknown party had initiated clearing and grubbing activities on property adjacent to the West Lake landfill. A written notification of this discovery was mailed to EPA on December 2, 1999 (Hockley, 1999).

Based on the potential for wind or precipitation runoff-induced erosion and transport of these soils, the Respondents through this work plan are proposing to conduct, subject to EPA approval, **a time-critical removal action to retrieve and relocate the soil piles to prevent potential offsite transport.**"